

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

v.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-PACKARD
FINANCIAL SERVICES (INDIA) PRIVATE
LIMITED, HP INC., HEWLETT PACKARD
ENTERPRISE COMPANY, and DAVID GILL,

Defendants.

) **Civil Action No. 1:16-CV-10386 (LTS)**

**PLAINTIFFS' MOTION FOR LEAVE TO FILE A
MEMORANDUM IN EXCESS OF TWENTY PAGES**

Plaintiffs, through their undersigned counsel, respectfully move this Court pursuant to Local Rule 7.1(b)(4) for leave to file a memorandum in excess of twenty pages in support of their motion to compel. As grounds for this motion, Plaintiffs respectfully submit that the following circumstances justify the expansion of the memorandum's length:

1. Plaintiffs intend to file their Renewed Motion to Compel and Supporting Memorandum of Law pursuant to the Court's Order entered on September 16, 2019, Dkt. 234.
2. Pursuant to Local Rule 37.1(b), Plaintiffs' motion incorporates each interrogatory and request for production raising an issue to be decided by the Court, with Defendants' responses thereto and the statements of Plaintiffs' position on each contested issue.

3. Furthermore, Plaintiffs' motion raises additional issues and arguments concerning the selection of Defendants' custodians and privilege designations.

4. The challenge of meaningfully accommodating the above within a memorandum of twenty pages has proven to be a great one. Accordingly, Plaintiffs respectfully move the Court for leave to file their accompanying Renewed Motion to Compel and Supporting Memorandum of Law of twenty-eight pages.

Dated: October 4, 2019

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Dmitry Joffe", is written over a horizontal line.

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Counsel to Plaintiffs

CERTIFICATE OF SERVICE

I, Dimitry Joffe, hereby certify that on this 4th day of October 2019, I caused a copy of Plaintiffs' Motion for Leave to File a Memorandum in Excess of Twenty Pages with exhibits thereto to be served by ECF upon Defendants' counsel of record.

A handwritten signature in blue ink, appearing to read "Dimitry Joffe", with a horizontal line extending to the right.

Dimitry Joffe
JOFFE LAW P.C.
Counsel to Plaintiffs